

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No. 3:19-CV-210**

**YURII KOROTKOV and IRYNA
PAVLOVNA KOROTKOVA**

Plaintiffs

v.

SUNTRUST MORTGAGE, INC.

Defendants

**CERTIFICATION AND REPORT
OF RULE 26(f) CONFERENCE
AND DISCOVERY PLAN**

- 1) Certification of Conference. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on October 24, 2019, and was conducted by the undersigned, appearing for the designated parties in the above captioned case.
- 2) Pre-Discovery Disclosures. The information required by Fed. R. Civ. P. 26(a)(1) will be exchanged by November 25, 2019.
- 3) Discovery Plan. The parties propose to the Court the following discovery plan:
 - a. Discovery will be needed on the following subjects; relevant non-privileged information, testimony, and documents going toward the allegations advanced by the plaintiff, and the denials and defenses of the defendant to the extent that they relate directly to the allegations advanced by the plaintiff and plaintiff's damages.
 - b. All discovery shall be commenced in time to be completed by May 18, 2020.
 - c. Discovery limits:
 - i. Maximum of 30 interrogatories, including subparts, by each party to any other party.
 - ii. Maximum of 30 requests for production of documents, including subparts, by each party to any other party.

- iii. Maximum of 30 requests for admission by each party to any other party.
 - iv. Maximum of 5 depositions by plaintiff and 5 by defendant.
 - 1. Depositions pursuant to Fed. R. Civ. P. 30(b)(6) shall be conducted in the city and state of the principal business for the company deponent unless otherwise agreed to by the parties.
 - d. Reports from retained experts under rule 26(a)(2) along with a list of each expert's available dates for depositions shall be due:
 - i. From Plaintiff by March 16, 2020.
 - ii. From Defendant by April 13, 2020.
 - e. Supplementation under Rule 26(e) shall be due within 7 days of acquiring such knowledge as would trigger a Rule 26(e) supplementary disclosure or response, but in no case after May 25, 2020.
- 4) Other Items.
- a. Discovery of electronic information will be handled as follows: to the extent that any non-privileged electronically stored information is discoverable and requested, the producing party will provide hard copies of the information printed from the original source of the stored information, i.e. the producing party's source of the stored information rather than producing the attorney's stored information.
 - b. The parties do not request a conference with the Court before entry of the scheduling order.
 - c. All potentially dispositive motions shall be filed by July 20, 2020.

- d. Settlement may be evaluated on an ongoing basis by all parties working in good faith.
- e. Parties agree to mediation on or before April 20, 2020. Out of state parties must appear personally.
- f. Final lists of witnesses and exhibits under Rule 26(a)(3) are due:
 - i. From Plaintiff 30 days before the final pretrial conference.
 - ii. From defendants 20 days before the final pretrial conference.
- iii. All parties must serve objections pursuant to Rule 26(a)(3) within 14 days after service of final lists of witnesses and exhibits.
- g. The parties have discussed the issue of consent to the jurisdiction of a US magistrate judge. The parties agree to submit to the jurisdiction of a magistrate for a judicial settlement conference, but do not otherwise agree to magistrate jurisdiction.
- h. The case should be ready for trial by November 2020. Trial of this matter is expected to take approximately 3 days.

TODAY is October 24, 2019.

COLLUM & PERRY, PLLC

/s/ M. Shane Perry

M. Shane Perry
NC State Bar No. 35498
109 W. Statesville Avenue
Mooresville, NC 28115
Telephone: (704)663-4187
Facsimile: (704)663-4178
shane@collumperry.com
Attorney for Plaintiffs

TROUTMAN SANDERS, LLP

/s/ Jamie Rudd

Jamie E. Rudd
N.C. State Bar No. 50968
305 Church at North Hills Street, Suite 1200
Raleigh, North Carolina 27609
Telephone: (919) 835-4133
Facsimile: (919) 829-8725
jamie.rudd@troutman.com
Attorney for Defendant